

UNITED STATES DISTRICT COURT
DISTRICT OF MAINE

OLYMPIA HOTEL MANAGEMENT, LLC,
a Delaware limited liability company,

Plaintiff,

v.

THE BEND HOTEL DEVELOPMENT
COMPANY, LLC, an Illinois limited liability
company,

Defendant.

Civil Action No. 2:20-cv-136-NT

DECLARATION OF SARA MASTERSON

I, Sara Masterson, hereby declare under oath as follows:

1. I am the President of Olympia Hotel Management, LLC (“Olympia”), the Plaintiff in this case. I have held this position since 2019. I was previously the Vice President of Olympia and held that position starting in 2013.

2. I live and work in Maine and did so at all times relevant to this dispute.

3. Olympia provides operational and management services for hotels around the United States. Our office is located in Portland, Maine.

4. From Maine, we work with hotel owners and developers to provide services to their hotels, including accounting and financial reporting, budgeting, sales and marketing, human resources, food and beverage management, risk management, purchasing, information technology, capital improvements, and maintenance. In short, Olympia’s business model is to provide hotel owners and developers with the deep pool of expertise that our personnel here in Maine have developed.

5. In 2014, Olympia executed two Hotel Management Agreements (“HMAs”) to operate and manage a Hyatt-branded extended stay and select service hotel in East Moline, Illinois (the “Hotel”) for a period of five years from the opening of the hotel, then projected for August 2015.

6. In 2017, the HMAs were amended to extend their term for five years running from December 2018. Olympia terminated the HMAs effective April 2020.

7. As President of Olympia, I managed Olympia’s contractual communications with the owner of the Hotel.

8. Attached as **Exhibit A** is a true and correct copy of a letter I sent to Dan Murphy, the majority owner of the Hotel, and Mike VanDeHeede, the owners’ on-site agent, regarding concerns about potential liability and certain aspects of the Hotel’s operations. As President, I sent several letters to the Hotel’s owners similar to Exhibit A regarding high-level concerns about the Hotel, including its finances.

I declare under the penalties of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: June 17, 2020

/s/ Sara Masterson
Sara Masterson

CERTIFICATE OF SERVICE

I hereby certify that on the date indicated below I caused a copy of the foregoing pleading to be filed with the Court's ECF filing system, which will cause an electronic notice to be sent to counsel of record.

Dated: June 19, 2020

/s/ Kyle M. Noonan

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